



ARKANSAS
Department of Environmental Quality

Interoffice Memorandum

TO : Tammie Hynum, Manager, Technical Branch, Hazardous Waste Division (HWD)

THROUGH : Annette Cusher, Engineer Supervisor, Technical Branch, HWD

FROM : Clay McDaniel, Engineer, Technical Branch, HWD

DATE : July 14, 2009

SUBJECT : Comments on Wormald submittal:
Focused Feasibility Study Report for Site 3 dated June 29, 2009
AFIN 54-00068 EPA ID ARD990660649

In the above mentioned report, Wormald proposes to place a deed restriction on a portion of Site 3 to prevent possible exposure to subsurface soil. While I agree with their remedy, I believe we should wait and do a deed restriction for the whole site, less we get overlapping deed restrictions.

The remedy chosen was based on a model that calculates the potential for dinoseb to be released from an area 0.26 acres located in Site 3. The report approximates dinoseb to be located within the sub-surface soil from 4-8 feet bgs. However, this is a very rough approximation, and there are potentially higher concentrations of dinoseb below this sub-soil interval.

ADEQ made comments on the Facility Invest Report in a letter dated May 21, 2009. Comment no. 1 of this letter stated: "The statement that "no further delineation is required" is not necessarily correct and should be revised." This comment was not adequately addressed and has thus carried over to inadequate data in this Focused Feasibility Study Report.